

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF: Woodrow Price, III

CHAPTER 13

CASE #: 15-03421-NPO

RESPONSE TO MOTION FOR RELIEF FROM STAY

[DKT. NO.: 38]

COMES NOW, the Debtor, by and through his attorney, and files this Response to Jerry Baughman's Motion for Relief from Stay. In support of this motion, the Debtor states as follows:

1. That on November 3, 2015, Debtor filed a Chapter 13 Bankruptcy Petition; relief was granted that day.
2. That Debtor admits that Civil Cause No. 15-2658, Jerry W. Baughman v. Woodrow Price III and John and Jane Does 1-10, was filed in the First Judicial District of Hinds County that resulted from an automobile accident that occurred on or about April 27, 2014.
3. That Debtor contends that allowing the Bankruptcy Stay to be lifted, solely for the purposes of obtaining a judgment, would be burdensome and unfairly prejudicial to debtor's bankruptcy estate, as debtor has been in his bankruptcy almost a year.
4. That Debtor prays that the Motion for Relief be denied. Debtor further prays for general relief.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that Jerry Baughman's Motion be denied.

RESPECTFULLY SUBMITTED this 7th day of July, 2016.

/s/ William W. Stover Jr.

William W. Stover Jr., MSB 8885

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I, William W. Stover Jr., Attorney for the above listed debtor, do hereby certify that I have this date mailed a true and correct copy of the above Response to:

James L. Henley, Jr.
US Trustee
Jerry Baughman

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/s/ William W. Stover, Jr.

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